

## **REMARKS/ARGUMENTS**

Applicants respond herein to the Final Office Action of September 11, 2008.

Claims 7-9, 13 and 14 were withdrawn from consideration. Claims 1-6 and 10-12 were rejected in the Office Action. Applicants amended Claims 1, 4 and 10, added Claims 15-18 and respectfully request reconsideration of the rejection. Support for new Claims 15-18 is found in paragraph [0019] of the specification.

Claims 1-6 and 10-12 were rejected under 35 U.S.C. 112, first paragraph, because the claims contained certain subject matter which was not adequately described in the specification. Applicants deleted the subject matter identified by the Examiner from the claims.

Claims 1-6 and 10-12 were rejected in the Office Action under 35 U.S.C. 102(e) as being anticipated by Comaniciu et al. (U.S. Patent No. 6,590,999).

Claims 1 and 10, as amended, recite a system and method, respectively, for monitoring and displaying relative positions of competing moving objects, where a unique identifier 16 placed onto each competing moving object. Identifier 16 uniquely identifies each competing moving object at any moment of time. Further, as described in paragraph [0017] of the Application, identifier detector 10 detects relative positions of the unique identifiers with respect to each other. Detector 10 then conveys the detected relative positions of the unique identifiers to a processor 12, which determines relative positions of the competing moving objects and identifies a winner among the competing moving objects based on the conveyed relative positions of the unique identifiers. In other words, the processor determines distances between competing objects (as described in paragraph [0021]) to identify the winner.

Contrary to the recitations of Claims 1 and 10, Comaniciu teaches a method and apparatus for determining an absolute position of a particular moving target from one frame to the next. Specifically, Comaniciu states:

“A degree of similarity ( $p(y_0)$ ) is computed between a given target (at  $y_0$ ) in a first frame and a candidate target (at  $y_1$ ) in a successive frame, the degree being expressed by a metric derived from the Bhattacharyya coefficient. A gradient vector corresponding to a maximization

of the Bhattacharyya coefficient is used to derive the most probable location of the candidate target in the successive frame.” See, Comaniciu, Abstract.

Therefore, contrary to the Examiner’s statement in the Office Action, Comaniciu does not disclose or even suggest determining relative positions of the competing moving objects with respect to each other, as recited in the amended Claims 1 and 10. If the Examiner continues to insist that Comaniciu discloses determination of the relative position of the competing objects with respect to each other, Applicants respectfully request that the Examiner indicate specific language of Comaniciu disclosing this limitation.

Further, Comaniciu fails to disclose the limitation of Claims 1 and 10 requiring identifying one of the competing moving objects as a winner and displaying the relative position of the winner on the display.

Accordingly, Claims 1 and 10 are allowable over the cited prior art.

Claims 2-6, 11-12 and 15-18 depend from Claims 1 and 10. Therefore, Claims 2-6, 11-12 and 15-18 are allowable at least for the same reasons as Claims 1 and 10 and, further, on their own merits. Favorable reconsideration of the rejection and allowance of Claims 1-6, 10-12 and 15-18 is respectfully requested.

THIS CORRESPONDENCE IS BEING  
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Respectfully submitted,



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